

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

Mahmoud KHALIL,

Petitioner,

v.

Donald J. TRUMP, in his official capacity as President of the United States; William P. JOYCE, in his official capacity as Acting Field Office Director of New York, Immigration and Customs Enforcement; Yolanda PITTMAN, in her official capacity as Warden of Elizabeth Contract Detention Facility; Caleb VITELLO, Acting Director, U.S. Immigration and Customs Enforcement; Kristi NOEM, in her official capacity as Secretary of the United States Department of Homeland Security; Marco RUBIO, in his official capacity as Secretary of State; and Pamela BONDI, in her official capacity as Attorney General, U.S. Department of Justice,

Respondents.

Case No. 25-cv-01963
(MEF-MAH)

MOTION TO SEAL

Pursuant to Local Civil Rule 5.3, Counsel for Petitioner in the above-captioned case respectfully submits this motion to seal the redacted information contained in his June 13, 2025 filing at ECF 302, his June 16, 2025 filing at ECF 308-1, and his June 18, 2025 filings at ECF 312-1, ECF 312-2, and ECF 312-3. Specifically, Petitioner seeks an Order pursuant to Local Civil Rule 5.3(c) granting leave to place narrowly tailored redactions over his own personally identifying information and personally identifying information of attorneys, ICE personnel, and a non-party former colleague of Mr. Khalil's.

The government consents to these redactions.

Submitted with this motion is the Declaration of Liza Weisberg, an Index detailing the redacted information to be sealed and the basis for sealing, and a Proposed Order to Seal including Proposed Findings of Fact and Conclusions of Law in accordance with Local Civil Rule 5.3(c) and 7.1(e).

WHEREFORE, Petitioner respectfully requests that the Court grant this Motion and enter an order approving the redactions in ECF 302, ECF 308-1, ECF 312-1, ECF 312-2, and ECF 312-3.

Date: June 27, 2025

Respectfully submitted:

/s/Liza Weisberg

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